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7 Attorney for Marco Antonio Reyes

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MARCO ANTONIO REYES,
15 Defendant.
16

Case No. 2:16-mj-828-VCF

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(First Request)

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
19 United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the
20 United States of America, and Rene L. Valladares, Federal Public Defender, and Monique Kirtley,
21 Assistant Federal Public Defender, counsel for Marco Antonio Reyes, that the Preliminary Hearing
22 currently scheduled for January 13, 2017 at 4:00 p.m., be vacated and set to a date and time
23 convenient to this Court but no longer than forty-five (45) days.

24 The Stipulation is entered into for the following reasons:

- 25 1. The client is in custody and does not oppose the continuance.
26 2. The parties are in the process of negotiating the details of a global resolution in
27 pending case number 2:12-cr-076-LDG-CWH, which is inextricably linked to 2:16-mj-828-VCF.
3. Additionally, denial of this request for continuance could result in a miscarriage of

1 justice.

2 This is the First stipulation to continue preliminary hearing filed herein.

3 DATED this 9th day of January, 2017.

4
5 RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

6
7 */s/ Monique Kirtley*
By _____

8 MONIQUE KIRTLEY
9 Assistant Federal Public Defender

/s/ Elham Roohani
By _____

ELHAM ROOHANI
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No. 2:16-mj-828-VCF

4 Plaintiff,

ORDER

5 v.

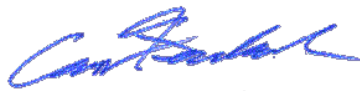
6 MARCO ANTONIO REYES,

7 Defendant.
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10 **FINDINGS OF FACT**

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12 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
13 January 13, 2017 at 4:00 p.m. be vacated and continued to 2-27-17 at the hour of
14 4:00 P
_____:____.m.

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16 DATED this 9th day of January, 2017.

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18 UNITES STATES MAGISTRATE JUDGE
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